

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECOND AMENDMENT ARMS, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 10 CV 4257
)	Hon. Robert M. Dow, Jr.
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	

PROPOSED AGREED SCHEDULING ORDER

Pursuant to the Court's direction at the status hearing held on April 27, 2016, Plaintiffs Second Amendment Arms, R. Joseph Franzese, and Tony Cole (collectively, "Plaintiffs"), by their attorney, David G. Sigale of the Law Offices of David G. Sigale, P.C., and Defendants City of Chicago, Mayor Rahm Emanuel, Superintendent of Police Eddie Johnson, and City Clerk Susana Mendoza (collectively, "Defendants") (together, with Plaintiffs, "Parties"), by their attorney, Stephen R. Patton, Corporation Counsel, hereby propose the following discovery schedule in the above-captioned matter:

1. Written fact discovery closes on July 6, 2016;
2. Oral fact discovery closes on October 6, 2016;
3. Plaintiffs' expert disclosures (if any) will be due by November 7, 2016;
4. Discovery of Plaintiffs' experts closes on December 19, 2016;
5. Defendants' expert disclosures (if any) will be due by January 18, 2017; and
6. Discovery of Defendants' experts closes on March 6, 2017.

The Parties respectfully request that the Court schedule a status after the conclusion of expert discovery to address any remaining discovery matters and to set a schedule for the filing

of summary judgment motions.

Date: May 6, 2016

Respectfully submitted,

STEPHEN R. PATTON
Corporation Counsel for the City of Chicago

By: /s/ William Macy Aguiar
Senior Counsel

William Macy Aguiar
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Agreed to by:

David G. Sigale, Esq.
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, William Macy Aguiar, an attorney, hereby certify that on this, the 6th day of May, 2016, I caused a copy of the foregoing **Proposed Agreed Scheduling Order** to be served by electronic filing (ECF) on:

David G. Sigale
Law Firm of David G. Sigale, P.C.
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Glen Ellyn, Illinois 60137

/s/William Macy Aguiar
William Macy Aguiar